

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

9:22-cv-01874-DCN

CIVIL ACTION NO.: 2022-CP-27-00208

A.M.L., J.J.L., E.R.L., by and through)
their Next of Friend, John Doe,)
R.D.M., y and through his Next of)
Friend, James Snow, J.J.G. and)
S.T.S.,)

Plaintiffs,)

vs.)

Wright Directions, LLC, Renee Sutton,)
LPC, Nicki Nichols, LPC, WDFS)
Employee #1, WDFS Employee #2,)
WDFS Employee #3, WDFS)
Employee #4, Jawanda McNair, Gregg)
Wright, Sandra Roberts, Cynthia S.)
Thomas, M. Ed., Julia H. Gwynn, LPC,)
Stacy Leo, LISW-CP, Tyrone B.)
Beckett, First Zion Missionary Baptist)
Church, South Carolina Department of)
Social Services, SCDSS Case Worker)
#1, SCDSS Case Worker #2, SCDSS)
Case Worker #3, SCDSS Case)
Worker #4, SCDSS Case Worker)
Supervisor #1, SCDSS Case Worker)
Supervisor #2, Magnelia Washington)
Cottrell, Charles Brown, Franklin)
County Children Services, FCCS Case)
Worker #1, FCCS Case Worker #2,)
FCCS Case Worker #3, FCCS Case)
Worker #4, FCCS Case Workers)
Supervisor #1, FCCS Case Supervisor)
#2, Adoption Advocacy, Inc., June)
Bond, Joe Haynes, Beaufort County)
Scholl Board Member #1, Beaufort)
County School District Administrator)
#1, Beaufort County School District)
Administrator #2, Seaside Pediatrics)

NOTICE OF REMOVAL

of Bluffton P.C., Maureen Berrigan,)
M.D., Palmetto Pediatrics of the Low)
Country, LLC, Lance Lowe, M.D.,)
)
Defendant.)
_____)
)

TO: Robert J. Butcher Esq. and Deborah J. Butcher, Esq. Attorneys for Plaintiffs:

YOU ARE HEREBY NOTIFIED that Defendants South Carolina Department of Social Services, SCDSS Case Worker #1, SCDSS Case Worker #2, SCDSS Case Worker #3, SCDSS Case Worker #4, SCDSS Case Worker Supervisor #1, and SCDSS Case Worker Supervisor #2, by and through their undersigned attorneys, Howell Gibson and Hughes, P.A., hereby give Notice of Removal of Civil Action No. 2022-CP-27-00208 brought in the Court of Common Pleas in the 14th Judicial Circuit in and for Jasper County, South Carolina to the United States District Court, District of South Carolina, Beaufort Division.

The complaint alleges claims of constitutional violations brought under 42 U.S.C. § 1983. Additionally, the above captioned action includes a claim brought under the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1964, and the 14th Amendment of the United States Constitution. Therefore, due to the joinder of Federal and State Law claims, this action is proper in Federal Court.

The above-entitled action was commenced by filing of a Summons and Complaint on or about May 9th, 2022 in the Court of Common Pleas for the County of Jasper; and service of the same via Certified Mail (return receipt requested) received by this Defendant on or about May 19th, 2022. Therefore, this Notice of Removal is timely.

Further, this Defendant has requested the consent of the co-defendants for the removal of this action by letter, sent today, June 10th, 2022.

The above captioned action is one which may be removed to the United States District Court pursuant to 28 U.S.C. § 1441, § 1443, and § 1331 in compliance with § 1446 establishing the procedure for removal.

WHEREFORE, these Defendants pray that the above captioned action now pending in the Court of Common Pleas for Jasper County, South Carolina, be removed to the Beaufort Division of the United States District Court for the District of South Carolina.

Respectfully Requested,

HOWELL, GIBSON & HUGHES, P.A.

By: **s/ Robert W. Achurch, III**

Robert W. Achurch, III

Robert S. Dennis

PO Box 40

Beaufort, SC 29901-0040

(843) 522-2400

rachurch@hgupa.com

Attorneys for Defendants, South
Carolina Department of Social Services,
SCDSS Case Worker #1, SCDSS Case
Worker #2, SCDSS Case Worker #3,
SCDSS Case Worker #4, SCDSS Case
Worker Supervisor #1, SCDSS Case
Worker Supervisor #2, Magnelia
Washington Cottrell and Charles Brown

Beaufort, South Carolina

June 13th, 2022